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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF ARIZONA**

14 Valentino Dimitrov, individually, and on  
15 behalf of all others similarly situated;

16 Case No.: CV-23-00226-PHX-DJH

17 Plaintiffs,

18 vs.

19 Stavatti Aerospace, Ltd, a Minnesota  
20 corporation; Stavatti Aerospace, Ltd, a  
21 Wyoming corporation; Stavatti  
22 Corporation, a Minnesota corporation;  
23 Stavatti Immobiliare, Ltd, a Wyoming  
24 corporation; Stavatti Industries, Ltd, a  
corporation; Stavatti Niagara,  
Ltd, a New York corporation Stavatti  
Super Fulcrum, Ltd, a Wyoming  
corporation; Stavatti Ukraine, a Ukrainian  
business entity; Stavatti Heavy Industries  
Ltd, a Hawaii corporation; Christopher  
Beskar and Maja Beskar, husband and  
wife; John Simon and Jean Simon,  
husband and wife; William McEwen and  
Patricia McEwen, husband wife; Rudy  
Chacon and Jane Doe Chacon, husband  
and wife; and DOES 1 through 10,  
inclusive,

25 Defendants.

26 **DECLARATION OF PLAINTIFF  
VALENTINO DIMITROV IN SUPPORT  
OF MOTION FOR ENTRY OF  
DEFAULT JUDGMENT AGAINST  
DEFENDANTS STAVATTI  
AEROSPACE, LTD, A WYOMING  
CORPORATION; STAVATTI  
IMMOBILIARE, LTD, A WYOMING  
CORPORATION; STAVATTI  
INDUSTRIES, LTD, A WYOMING  
CORPORATION; STAVATTI SUPER  
FULCRUM LTD, A WYOMING  
CORPORATION; STAVATTI HEAVY  
INDUSTRIES LTD, A HAWAII  
CORPORATION; STAVATTI  
NIAGARA LTD, A NEW YORK  
CORPORATION; AND JOHN SIMON**

27 I, Valentino Dimitrov, declare under penalty of perjury that the following is true

1 and correct:

- 2 1. I am the Plaintiff in this matter.
- 3 2. All statements in the Complaint are true.
- 4 3. All exhibits attached to the Complaint are accurate.
- 5 4. I am a hard-working individual who invests and loans money to businesses.
- 6 5. In February of 2022, I loaned Defendant Stavatti Aerospace Ltd \$1,000,000

7 based on false representations and assertions the Defendants in this case intended for me  
8 to rely on. It's my understanding that Defendant Stavatti Aerospace Ltd is a Ponzi scheme  
9 and all of the named Defendants are either "subsidiaries" of Stavatti Aerospace Ltd or  
10 "executives" of a Stavatti Aerospace Ltd "subsidiary." Upon information and belief, the  
11 Defendants listed in this action worked in concert to defraud me. They created fake  
12 marketing materials and fake revenue projections. The Defendants unfortunately  
13 succeeded in defrauding me. I loaned them \$1,000,000 based on their false representations  
14 that they would return my \$1,000,000 as well as my \$5,000,000 in profit distributions.  
15 Defendants worked hard to trick me into loaning them money as if the money was to be  
16 used in a real revenue generating enterprise.

17 6. None of the named Defendants have returned any of the money I loaned to  
18 them.

19 7. I am damaged, at least, in the amount of \$6,000,000.

20 8. I understand that all of the Defendants I am motioning for default against  
21 have notice of this lawsuit and have either chosen not to answer or have failed to answer  
22 by the deadline provided by the Federal Rules of Civil Procedure.

23 9. I respectfully ask that you hold Stavatti Aerospace Ltd, a Wyoming  
24 corporation; Stavatti Immobiliare LTD, a Wyoming corporation; Stavatti Industries, LTD,  
25 a Wyoming corporation; Stavatti Super Fulcrum LTD, a Wyoming corporation; Stavatti

1 Heavy Industries Ltd, A Hawaii corporation; Stavatti Niagara LTD, a New York  
2 corporation, and John Simon jointly and severally liable for the \$6,000,000 in damages I  
3 have suffered.

4

5 EXECUTED this 5<sup>th</sup> day of April, 2023.

6

7 **ENARA LAW, PLLC**

8 By: /s/   
9 Valentino Dimitrov

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